UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	-X	
MIRIAM FULD, et. al.,	:	
Plaintiffs,	:	Case No.: 20-cv-3374 (JMF)
- against -	:	Cuse 110 20 ev 3374 (3111)
THE PALESTINE LIBERATION ORGANIZATION and THE PALESTINIAN AUTHORITY,	:	
Defendants.	:	
	: -X	

## <u>DECLARATION OF JEFFREY FLEISCHMANN, ESQ. IN OPPOSITION TO DEFENDANTS' MOTION TO DISMISS</u>

Jeffrey Fleischmann, Esq. declares under penalty of perjury as follows:

- 1. I am a member of the bar of this Court, and principal of the Law Offices of Jeffrey Fleischmann, P.C., co-counsel for Plaintiffs in the above-caption. I submit this declaration in opposition to Defendants' motion to dismiss.
- 2. Annexed hereto as Exhibit A is a true and correct copy of the Declaration of Arieh Spitzen in *Sokolow (Waldman) v. PLO*, D.E. 1020, No. 1:04-cv-0397-GBD (S.D.N.Y.). Its Exhibits are at D.E. 1020, Exhibits 1-13.<sup>1</sup>
- 3. Annexed hereto as Exhibit B is a true and correct copy of the Declaration of Kent Yalowitz in *Sokolow (Waldman) v. PLO*, D.E. 1018, No. 1:04-cv-0397-GBD (S.D.N.Y.), together with its exhibits. Its Exhibits are at D.E. 1018, Exhibits 1-62.

1

<sup>&</sup>lt;sup>1</sup> The exhibits to these declarations are not attached, but are incorporated by reference, due to their voluminous size.

- 4. Annexed hereto as Exhibit C is a true and correct copy of the Declaration of Nick Kaufman in *Sokolow (Waldman) v. PLO*, D.E. 1016, No. 1:04-cv-0397-GBD (S.D.N.Y.).
- 5. Annexed hereto as Exhibit D is a true and correct copy of Plaintiffs' memorandum of law regarding jurisdiction in *Sokolow (Waldman) v. PLO*, D.E. 1015, No. 1:04-cv-0397-GBD (S.D.N.Y.).
- 6. Annexed hereto as Exhibit E is a true and correct copy of the United States' Amicus Curaie Brief in *Klieman v. Palestinian Authority*, D.I. 15-7034 (D.C. Cir. March 13, 2019).
- 7. Annexed hereto as Exhibit F is a true and correct of NYTimes, Seeking Restart with Biden, Palestinians Eye an End to Prisoner Payments, Nov. 19, 2020, available at:

  <a href="https://www.nytimes.com/2020/11/19/world/middleeast/biden-palestinian-prisoner-payments.html">https://www.nytimes.com/2020/11/19/world/middleeast/biden-palestinian-prisoner-payments.html</a>

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 22, 2020.

By:	/s/
	Jeffrey Fleischmann, Esq.